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1
    Stacey White
    5316 Overland Avenue
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    Las Vegas, Nevada 89107
    In Proper Person
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                            UNITED STATES DISTRICT COURT
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                                   DISTRICT OF NEVADA
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    MEX PRODUCTIONS, INC., a
 6
    Nevada corporation,
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                                           Case No.: 2:16-CV-02875-RFB-GWF
                 Plaintiff,
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9
    VS.
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                                                         FILED
    MARCELLUS L REID, an individual)
                                                                          RECEIVED
                                                         ENTERED
                                                                         SERVED ON
    SHALEKA JONES, an individual,
11
                                                                COUNSEL/PARTIES OF RECORD
    DONALD LAHER, an individual,
12
    LAKEISHA BIAS-MILLS, an
                                                            MAY 3 0 2017
    Individual, NIGEL VILLAVERDE,
13
    An individual, MARIA BARRIOS,
    An individual, FELENA SMITH.
14
                                                         CLERK US DISTRICT COURT
    An individual; JOSE ALVAREZ,
                                                           DISTRICT OF NEVADA
                                                   BY:
15
    An individual, ANGELA
                                                                           DEPUTY
    GARDNER, an individual,
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    FRANCISCO RANGEL, an
    Individual, CHANEL HOWZE, an
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    Individual, STACEY WHITE, an
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    Individual, ELSIE SUVAUCHELLE,)
    An individual, DANA AYALA, an
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    Individual, HERMAN LEIBOUVITZ,)
    AN INDIVUAL, MIRIAM
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    MARTINEZ, an individual, SONIA)
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    SABOGAL, an individual,
    DOMANIC BENSON, an
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    Individual, MELISSA STRUNK, an )
    Individual, MICHAEL DARREN, an)
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    Individual, GOWAYNE
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    CRISOSTOMO, an individual.
    JONATHON MOORE, an
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    Individual, NANCY BERNARD, an )
    Individual, JOHN AND JANE
26
    DOES.
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                 Defendant.
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#### **ANSWER**

COMES NOW, Defendant, Stacey White, in proper person, hereby files an Answer to Plaintiff's Complaint as follows:

- Answering the allegations contained in Paragraph 1-2 of Plaintiff's Complaint, Defendant denies, generally and specifically, each and every allegation contained therein and the whole thereof.
- Answering the allegations contained in Paragraph 3-5 of Plaintiff's Complaint, Defendant denies, generally and specifically, each and every allegation contained therein and the whole thereof.
- Answering the allegations contained in Paragraph 6-9 of Plaintiff's Complaint, Defendant denies, generally and specifically, each and every allegation contained therein and the whole thereof.
- 4. Answering the allegations contained in Paragraph 10 of Plaintiff's Complaint, Defendant denies, generally and specifically, each and every allegation contained therein and the whole thereof.
- 5. Answering the allegations contained in Paragraph 11-13 of Plaintiff's Complaint,
  Defendant denies, generally and specifically, each and every allegation contained therein
  and the whole thereof.
- 6. Answering the allegations contained in Paragraph 14-15 of Plaintiff's Complaint, Defendant denies generally and specifically, each and every allegation contained therein and the whole thereof.

- 7. Answering the allegations contained in Paragraph 16-18 of Plaintiff's Complaint,

  Defendant denies, generally and specifically, each and every allegation contained therein
  and the whole thereof.
- 8. Answering the allegations contained in Paragraph 19-26 of Plaintiff's Complaint,

  Defendant denies, generally and specifically, each and every allegation contained therein
  and the whole thereof.
- 9. Answering the allegations contained in Paragraph 27-28 of Plaintiff's Complaint, Defendant denies, generally and specifically, each and every allegation contained therein and the whole thereof.
- 10. Answering the allegations contained in Paragraph 29-35 of Plaintiff's Complaint,

  Defendant denies, generally and specifically, each and every allegation contained therein
  and the whole thereof.
- 11. Answering the allegations contained in Paragraph 36-42 of Plaintiff's Complaint,

  Defendant denies, generally and specifically, each and every allegation contained therein
  and the whole thereof.
- 12. Answering the allegations contained in Paragraph 43-44 of Plaintiff's Complaint,

  Defendant denies, generally and specifically, each and every allegation contained therein
  and the whole thereof.
- 13. Answering the allegations contained in Paragraph 45-52 of Plaintiff's Complaint,
  Defendant denies, generally and specifically, each and every allegation contained therein
  and the whole thereof.

- 14. Answering the allegations contained in Paragraph 53-63 of Plaintiff's Complaint,

  Defendant denies, generally and specifically, each and every allegation contained therein
  and the whole thereof.
- 15. Answering the allegations contained in Paragraph 64-69 of Plaintiff's Complaint, Defendant denies, generally and specifically, each and every allegation contained therein and the whole thereof.

## **DEFENDANT ASSERTS THE FOLLOWING AFFIRMATIVE DEFENSES:**

## FIRST AFFIRMATIVE DEFENSE

Plaintiff's Complaint fails to state a claim against Defendant upon which relief can be granted.

#### SECOND AFFIRMATIVE DEFENSE

Defendant alleges that the Plaintiff's claims are barred by the equitable doctrines of laches, unclean hands, and failure to do equity.

### THIRD AFFIRMATIVE DEFENSE

Defendant reserves the right to assert additional affirmative defenses in the event discovery or investigation indicate that additional affirmative defenses are applicable.

#### **PRAYER**

WHEREFORE, Defendant prays for judgment as follows:

1. That Plaintiff take nothing by way of this Complaint;

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- 2. For reasonable attorney's fees and costs; and
- 3. For any such other and further relief as the Court may deem just and proper in the case.

Submitted by:

Stacey White

5316 Overland Avenue

Las Vegas, Nevada 89107

In Proper Person

2. For reasonable attorney's fees and costs; and

3. For any such other and further relief as the Court may deem just and proper in the case.

Submitted by:

Stacey White

5316 Overland Avenue

Las Vegas, Nevada 89107

In Proper Person

# **CERTIFICATE OF SERVICE**

Pursuant to NRCP 5 (b), and under penalty of perjury I certify that on this 25<sup>th</sup> day of May 2017, I served a copy of ANSWER, by depositing a true and correct copy thereof in the U.S. mail, first class postage prepaid and addressed as follows:

CHARLES C. RAINEY, ESQ. HAMRICK & EVANS, LLP 7670 W. Lake Mead Blvd., Ste. 140 Las Vegas, Nevada 89148

Maggie Strickland

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720 E. Charleston Bivd., #140 Las Vegas, Nevada 89104

JS DISTRICT COUT

333 Las Vagas Blud

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